

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: MONICA BORJA , aka Monica Borja-Rubio, aka Monica Rubio Debtor	: : :	Chapter 13 Case No.: 22-10001-pmm
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RESPONSE TO TRUSTEE’S MOTION TO DISMISS

AND NOW COMES Debtor(s) **MONICA BORJA**, by and through their attorney, J. ZAC CHRISTMAN, ESQUIRE, and in Response to the Trustee’s Motion to Dismiss avers:

1. Admitted.
2. Admitted.
3. Denied. Debtor has paid \$ 750 to date and a payment of \$2,750 is imminent.

Additionally, Debtor. There has been no unreasonable delay, though hospitalization of a family member did temporarily decrease income. Debtor has reviewed a First Amended Chapter 13 Plan with Counsel, and has it for signature before filing. The First Amended Chapter 13 Plan contemplates payment in full of all timely filed claims, except for the mortgage claim, which will receive payment of the arrears and direct payments.

WHEREFORE, Debtor(s) **MONICA BORJA** respectfully prays this Honorable Court for an Order than the Trustee’s Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

/s/ J. Zac Christman
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